



COMPTROLLER

UNDER SECRETARY OF DEFENSE  
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WASHINGTON, DC 20301-1100



JUN 30 1998

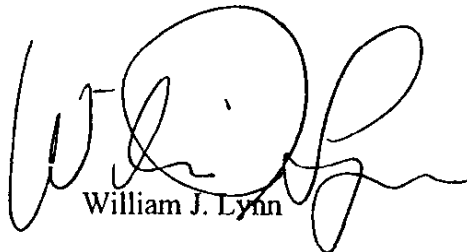
MEMORANDUM FOR DIRECTOR, ADMINISTRATION AND MANAGEMENT

SUBJECT Printing of Business Cards

In your memorandum of February 27, 1998, you requested an opinion on the August 1997 determination by the Department of Justice Office of Legal Counsel (OLC) that the General Services Administration could use its appropriated funds to purchase business cards for suitable mission-related use by its personnel.

It is my understanding that the DoD Office of the General Counsel believes that the OLC memorandum extends to the entire Executive Branch, and that it is within the discretion of the head of the agency to decide whether and to what extent its appropriated funds may be used to provide business cards for suitable mission-related use by employees. Applicable appropriations that finance daily operating expenses (e.g., Operation and Maintenance) would be the proper funds to use for this purpose.

On April 14, 1998, my office stated a belief that our policy should be to prohibit the use of appropriated funds to purchase business cards except extraordinary cases. However, given my understanding of the DoD General Counsel's position, I believe it is appropriate to modify the Comptroller's previous position. I continue to believe that the DoD policy should be to minimize the cost to DoD of providing business cards. Therefore, I suggest that the DoD policy regarding the printing of business cards should be limited to supplying laser card stock and permitting civilian employees and military members to use existing software to print their own business cards. Alternatively, a policy to permit the purchase of commercially printed business cards should be strictly limited in terms of who may be authorized business cards at government expense and the maximum cost per card. The effective date of the policy should be prospective only.



William J. Lynn